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16 Attorneys for Plaintiff

17 O.S. SECURITY LLC

18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**  
20 **SOUTHERN DIVISION**

21 O.S. SECURITY LLC,

22 Plaintiff,

23 vs.

24 BRK BRANDS, INC.

25 Defendant.

Case No. SACV14-00310 AG  
(DFMx)

Honorable Andrew J. Guilford

**PLAINTIFF'S UNOPPOSED  
MOTION TO CONTINUE  
MARKMAN DATES**

O.S. SECURITY LLC,  
Plaintiff,  
vs.

JOHN D. BRUSH & CO., d/b/a  
SENTRY GROUP  
Defendant.

Case No. SACV14-00314 AG  
(DFMx)

Honorable Andrew J. Guilford

O.S. SECURITY LLC,  
Plaintiff,  
vs.

SARGENT MANUFACTURING  
COMPANY, ASSA ALBOY, INC. and  
ASSA ALBOY AB,  
Defendants.

Case No. SACV14-00318 AG  
(DFMx)

Honorable Andrew J. Guilford

O.S. SECURITY LLC,  
Plaintiff,  
vs.

SCHLAGE LOCK COMPANY LLC,  
Defendant.

Case No. SACV14-00319 AG  
(DFMx)

Honorable Andrew J. Guilford

Plaintiff O.S. Security LLC respectfully requests that the Court continue the Markman Hearing presently set for February 17, 2015 and the pre-Markman deadlines and in support thereof states as follows:

1. From the filing of the Complaint in the above-captioned actions, O.S. Security has been represented by attorneys at the firm of Lee, Jorgensen, Pyle &

1 Kewalramani P.C. (“Lee Jorgensen”). The Lee Jorgensen firm is set to dissolve  
2 at the end of the year. Consequently O.S. Security retained the undersigned  
3 counsel at Mishcon de Reya New York LLP within the last several weeks to  
4 continue representation in these matters.

5 2. While the undersigned counsel is diligently working to understand the  
6 claim construction issues and the ramifications thereof in preparation for the  
7 upcoming Markman process, more time is required to come fully up to speed.

8 3. O.S. Security accordingly reached out to all of the Defendants to seek  
9 a short continuation of approximately two weeks of all Markman dates (except  
10 for those relating to claim construction discovery), including the Markman  
11 Hearing. Counsel for Defendants indicated a willingness to accommodate this  
12 request.

13 4. Counsel for Defendants have availability on March 3, 2015, and O.S.  
14 Security understands that the Court has availability on that date as well.  
15 Therefore, O.S. Security respectfully requests that the Court adjourn the  
16 Markman Hearing to March 3, 2015. Defendants do not oppose this motion so  
17 long as expert discovery regarding claim construction is not re-opened and so  
18 long as the Court adjourns the Markman Hearing to March 3, 2015. Any other  
19 date may create a conflict for one or more of the Defendants.

20 5. O.S. Security also requests that the pre-hearing deadlines be set as  
21 follows:

22 Joint Claim Construction and Pre-Hearing Statement – January 9, 2015

23 Opening Claim Construction Briefs – February 2, 2015

24 Responsive Claim Construction Briefs – February 17, 2015

25 WHEREFORE, O.S. Security respectfully requests that the Court enter the  
26 Proposed Order submitted herewith that extends the aforementioned Markman  
27 dates.

1  
2 Dated: December 18, 2014

MISHCON DE REYA NEW YORK LLP

3 By: /s/ John F. Petrsoric  
4 John F. Petrsoric

5 Attorneys for Plaintiff  
6 O.S. SECURITY LLC  
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